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Attorneys for Debtors and Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** ALL PAPERS SHALL BE FILED IN THE
LEAD CASE, NO. 19-30088 (DM)*

Case Nos. 19-30088 (DM)

(Lead Case) (Jointly Administered)

**DECLARATION OF ANGELA FERRANTE
IN SUPPORT OF REORGANIZED
DEBTORS' THIRTY FOURTH SECURITIES
CLAIMS OMNIBUS OBJECTION TO
CLAIMS ADOPTING RKS ALLEGATIONS**

1 I, Angela Ferrante, hereby declare that the following is true and correct to the best of my
2 knowledge, information, and belief:

3 1. I am a Managing Director of Kroll Settlement Administration LLC, an affiliate of
4 Kroll Restructuring Administration LLC (formerly known as Prime Clerk) (collectively for
5 purposes of this Declaration, “**Kroll**”). In my current role as Managing Director, I am responsible
6 for all business operations including but not limited to securities claims noticing and
7 administration.

8 2. I am providing this Declaration in support of the *Reorganized Debtors’ Thirty*
9 *Fourth Securities Claims Omnibus Objection To Claims Adopting RKS Allegations* (the
10 “**Omnibus Objection**”), filed contemporaneously herewith in the chapter 11 cases (the “**Chapter**
11 **11 Cases**”) of PG&E Corporation and Pacific Gas and Electric Company, as debtors and
12 reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**,” as applicable).¹

13 3. Kroll has been asked by the Reorganized Debtors and their counsel to assist with
14 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed
15 in the Chapter 11 cases. I have over 20 years of experience in class action, legal, and administrative
16 fields. I have personally overseen the administration of some of the most complex class action,
17 regulatory and bankruptcy administrations in the country.

18 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based
19 upon my personal knowledge, the knowledge of other employees working under and alongside me
20 on this matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized
21 Debtors’ various advisors and counsel, and my review of relevant documents and information. If
22 called upon to testify, I would testify competently to the facts set forth in this Declaration. I am
23 authorized to submit this Declaration on behalf of the Reorganized Debtors.

24 5. Kroll has been asked by the Reorganized Debtors and their counsel to assist with
25 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed
26 in the Chapter 11 Cases and identifying claims to be included in omnibus objections, including the

27
28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms
in the Omnibus Objection.

1 Omnibus Objection. In furtherance thereof, our team has reviewed and established a database for
2 these claims. The database contains information extracted from proofs of claim and submitted by
3 claimants via an online portal, including, where such details were provided by the claimant,
4 information regarding when such claimant purports to have acquired their position(s) in the
5 Debtors' debt and equity securities that form the basis of the claim.

6 6. Based on our review, we have identified certain claims (the "**Claims**") derived from
7 the purchase or acquisition of specific PG&E securities – "**Utility Senior Notes**," as defined in
8 Section 1.246 of the Plan.

9 7. The Claims are included on **Exhibit A** to the Omnibus Objection, which was
10 prepared by AlixPartners, LLP as discussed in the McWilliams Declaration filed herewith, and are
11 indicated by a notation in the "Basis for Objection" column noting that the "Claims [are] Barred
12 by Release." I am familiar with the contents of Exhibit A and the process under which it was
13 prepared.

14
15 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
16 and correct to the best of my knowledge, information, and belief.
17

18 Executed December 13, 2023 in New York.
19

20 /s/ Angela Ferrante

21 Angela Ferrante
22 Managing Director
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